

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI**

In Re:)	Case No. 15-45816-705
)	Chapter 11
St. Louis Center for Aesthetic & Restorative)	
Dentistry – Guilan Norouzi, DDS, PC.)	Response Date: September 14, 2015 at 5:00 pm
)	Hearing Date: September 16, 2015
Debtor.)	Hearing Time: 10:30 a.m.
)	Hearing Location: St. Louis, Courtroom 7S
)	

DEBTOR’S MOTION TO DISMISS CHAPTER 11 CASE

COMES NOW St. Louis Center for Aesthetic & Restorative Dentistry – Guilan Norouzi, DDS, PC. (“Debtor”), Debtor and Debtor-in-Possession herein, and in support of its Motion to Dismiss its Chapter 11 Case (the “Motion”) states:

1. Debtor filed its petition for relief under Chapter 11 of the Bankruptcy Code on August 5, 2015 (the “Petition Date”). The Debtor continues to operate its business as a Debtor-in-Possession.

2. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. Venue is appropriate under 28 U.S.C. § 1408. This is a core proceeding under 28 U.S.C. § 157(b)(2).

3. Guilan Norouzi, DDS, is the sole member of the Debtor.

4. Since 2011, Norouzi and the Debtor have been involved in disputes and litigation with Norouzi’s cousin, Victoria Zadeh, over a variety of financial matters. The recent entry of several large default judgments against the Debtor and Norouzi individually led to this bankruptcy filing.

5. Norouzi and the Debtor have been attempting to resolve their disputes with Zadeh both before and after the Petition Date. The proposed resolution requires the debtor to restructure its obligations outside of this bankruptcy case in order to fund the resolution.

6. Debtor's efforts have not proceeded as quickly as hoped. The proposed lender has suggested that it could be in excess of two months before a lending decision was reached.

7. As a result, there is much work to do in this reorganization case, most of which would be wasted should a resolution be reached. In fact, moving forward without a resolution actually could harm the Debtor and make its reorganization less likely.

8. Accordingly, Debtor is seeking authority from this Court to voluntarily dismiss its Chapter 11 case without prejudice, allowing it to move forward in its efforts without the cost and expense of the ongoing reorganization.

9. A dismissal at this time would also conserve the resources of the Court and other professionals involved in the case.

10. Zadeh, through her counsel, have reached an agreement whereby neither she nor any related entities will attempt to execute on the outstanding judgments.

11. Should the settlement efforts fail, all parties recognize that the Debtor will be required to refile its case in this Court and implement an alternative plan of reorganization, which it believes will be less beneficial to all parties involved.

WHEREFORE, Debtor prays for an order of this Court dismissing without prejudice the Debtor's voluntary petition for relief under Chapter 11 of the Bankruptcy Code and granting such other and further relief as the Court may deem proper.

DANNA MCKITRICK. P.C.

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